

Hearing Date and Time: May 9, 2006 at 10:00 a.m.
Objections Deadline: May 5, 2006 at 4:00 p.m.

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-and -

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Automobile, Aerospace and Agricultural
Implement Workers of America (UAW)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
DELPHI CORPORATION, <i>et al.</i> ,	:	Case No. 05-44481 (RDD)
	:	(Jointly Administered)
Debtors.	:	
	:	
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NOTICE OF MOTION OF INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE AND IMPLEMENT WORKERS OF
AMERICA (UAW) TO LIMIT PARTICIPATION IN THE HEARING ON
DELPHI'S SECTION 1113 AND SECTION 1114 MOTION

PLEASE TAKE NOTICE that on April 26, 2006, the International Union, United
Automobile, Aerospace And Implement Workers of America (the "UAW" or the "Union"), by

its undersigned counsel, filed a Motion for an order pursuant to 11 U.S.C. §§ 1113(d)(1) limiting participation in the hearing on Delphi Corporation's Section 1113 and Section 1114 Motion to "interested parties" (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held commencing on May 9, 2006 at 10:00 a.m. (Prevailing Eastern Time) (the "Hearing") before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Second Supplemental Order Under 11 U.S.C. §§ 102(1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management, and Administrative Procedures (the "Second Supplemental Case Management Order") (Docket No. 2995), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon counsel for the UAW, Cohen, Weiss and Simon LLP, 330 West 42nd Street, New York, New York 10036 (Att'n Babette A. Ceccotti) and upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr.), O'Melveny & Myers LLP,

1625 Eye Street, NW, Washington, DC 20006 (Att'n: Tom A. Jerman), Groom Law Group, Chartered, 1701 Pennsylvania Avenue NW Washington, DC 20006 (Att'n: Lonie Hassel), (iii) counsel for the agent under the Debtors' prepetition credit facility, Simpson Thacher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Att'n: Kenneth S. Ziman), (iv) counsel for the agent under the postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att'n: Marlane Melican), (v) counsel for the Official Committee of Unsecured Creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att'n: Robert J. Rosenberg and Mark A. Broude), (vi) counsel for Wilmington Trust Company, Kirkpatrick & Lockhart Nicholson Graham LLP, 599 Lexington Avenue, New York, New York 10022 (Att'n Edward M. Fox), (vii) counsel for General Motors Corporation, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Att'n Martin J. Bienenstock), (viii) counsel for Appaloosa Management L.P. and Wexford Capital LLC, White & Case LLP, 1115 Avenue of the Americas, New York, New York 10036 (Att'n Glenn M. Kurtz), (ix) counsel for the International Union of Operating Engineers Local Union Nos. 18 and 832, Gorlick, Kravitz & Listhaus, P.C., 17 State Street, 4th Floor, New York, New York 10004 (Att'n Barbara Mehlsack), (x) Counsel for the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy Allied Industrial and Service Workers International Union, Meyer Suozzi, English & Klein, P.C., 1350 Broadway, Suite 501, New York, New York 10018 (Att'n Lowell Peterson), Counsel for the IBEW Local 663 and IAMAW District 10, Previant Goldberg, Uelmen, Gratz, Miller & Brueggeman, S.C., 1555 RiverCenter Drive - Suite 202, Milwaukee, Wisconsin 53212 (Att'n Jill M. Hartley), (xi) counsel for the International Union of Electronic, Electrical Salaried, Machine and Furniture Workers, Communications Workers of America, Kennedy Jennik & Murray, P.C., 113 University Place, New York, New

York 10003 (Att'n Thomas M. Kennedy) and (xii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Alicia M. Leonhard), in each case so as to be **received** no later than **4:00 p.m. (Prevailing Eastern Time)** on **May 5, 2006** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Second Supplemental Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein and in the Second Supplemental Case Management Order, the Bankruptcy Court may enter a final order granting the Motion without further notice.

Dated: April 26, 2006
New York, New York

/s/ Babette A. Ceccotti
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